

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;  
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;  
PLAINTIFF ALYAS; PLAINTIFF MARCOS;  
PLAINTIFF AHMED; PLAINTIFF RACHEL;  
PLAINTIFF ALI; HIAS, INC.; CHURCH  
WORLD SERVICE, INC.; and LUTHERAN  
COMMUNITY SERVICES NORTHWEST,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; MARCO RUBIO,  
in his official capacity as Secretary of State;  
KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security; ROBERT F.  
KENNEDY, JR., in his official capacity as  
Secretary of Health and Human Services,

*Defendants.*

Case No. 2:25-cv-255-JNW

**PLAINTIFFS' NOTICE OF  
SUPPLEMENTAL AUTHORITY**

Pursuant to Local Rules W.D. Wash. LCR 7(n), Plaintiffs respectfully submit this notice of supplemental authority relevant to their pending motion for class certification. *See* Dkt. No. 71.

In *Doe v. Noem*, No. 1:25-cv-10495-IT (D. Mass. May 28, 2025), Dkt. No. 107, the district court granted class-wide emergency relief staying the government's suspension of the adjudication of applications filed by or on behalf of individuals granted parole pursuant to certain processes and

1 certified a class comprising four subclasses of individuals impacted by the government’s policies.  
2 The court reasoned that the class satisfied the prerequisites of Rule 23(a) because, among other  
3 things, resolving the question of whether the policies were lawful “will effectively resolve, on a  
4 class-wide basis, the issue of whether Plaintiffs’ applications” and certain parole “adjudications  
5 were lawfully suspended.” *Id.* at 45. It further determined that class certification was appropriate  
6 under Rule 23(b)(2) because a stay of the government’s policies suspending and terminating  
7 adjudication of applications would address the injuries of the respective subclasses. *Id.* at 48.

8 A copy of the *Doe* court’s order is attached as Exhibit 1.  
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1 Dated: June 9, 2025

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